

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

**SCANNING TECHNOLOGIES
INNOVATIONS LLC,**

Plaintiff,

vs.

MOBOLUTIONS, LLC

Defendant.

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Case No: 4:22-cv-00372

PATENT CASE

JURY TRIAL DEMANDED

ORIGINAL COMPLAINT

Pursuant to F.R.C.P. 15(a)(1)(B), Plaintiff Scanning Technologies Innovations, LLC (“Plaintiff” and/or “STI”) files this Original Complaint against Mobolutions, LLC (“Defendant” and/or “Mobolutions”) for infringement of United States Patent No. 10,600,101 (hereinafter “the ‘101 Patent”).

PARTIES AND JURISDICTION

1. This is an action for patent infringement under Title 35 of the United States Code. Plaintiff is seeking injunctive relief as well as damages.

2. Jurisdiction is proper in this Court pursuant to 28 U.S.C. §§ 1331 (Federal Question) and 1338(a) (Patents) because this is a civil action for patent infringement arising under the United States patent statutes.

3. Plaintiff is a Texas limited liability company having an address address of 1 East Broward Boulevard, Suite 700, Ft. Lauderdale, FL 33301.

4. On information and belief, Defendant is a Texas limited liability company having a place of business at 5151 Headquarters Dr, Ste 125, Plano, TX 75024-0013. On information

and belief, Defendant may be served through its agent, Vijey Rajendran, 4020 Wind Dance Cir Plano, TX 75024.

5. On information and belief, this Court has personal jurisdiction over Defendant because Defendant has committed, and continues to commit, acts of infringement in this District, has conducted business in this District, and/or has engaged in continuous and systematic activities in this District.

6. On information and belief, Defendant's instrumentalities that are alleged herein to infringe were and continue to be used, imported, offered for sale, and/or sold in this District.

VENUE

7. Venue is proper in this District 28 U.S.C. §1400(b) because Defendant is deemed to reside in this District. Alternatively, acts of infringement are occurring in this District, and Defendant has a regular and established place of business in this District.

COUNT I **(INFRINGEMENT OF UNITED STATES PATENT NO. 10,600,101)**

8. Plaintiff incorporates paragraphs 1 through 7 herein by reference.

9. This cause of action arises under the patent laws of the United States and, in particular, under 35 U.S.C. §§ 271, *et seq.*

10. Plaintiff is the owner by assignment of the '101 Patent with sole rights to enforce the '101 Patent and sue infringers.

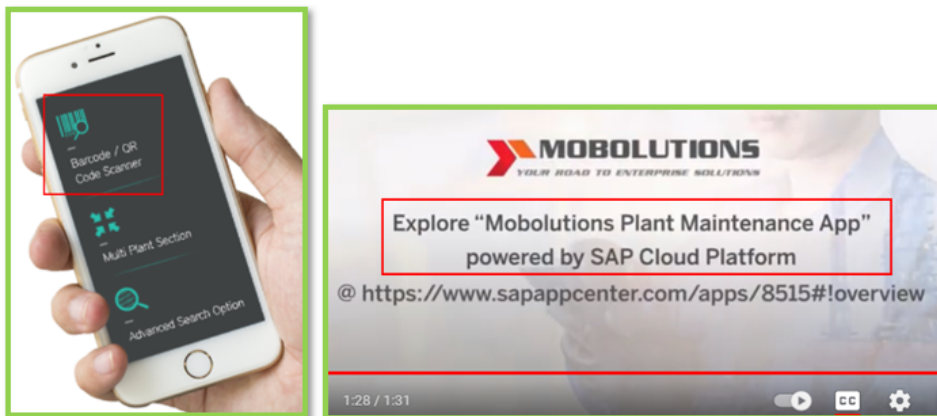
11. A copy of the '101 Patent, titled "Systems and Methods for Indicating the Existence of Accessible Information Pertaining to Articles of Commerce," is attached hereto as Exhibit A.

12. The '101 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

13. Upon information and belief, Defendant has infringed and continues to infringe one or more claims, including at least Claim 1, of the '101 Patent by making, using, importing, selling, and/or offering for sale an inventory management system covered by one or more claims of the '101 Patent. Defendant has infringed and continues to infringe the '101 Patent directly in violation of 35 U.S.C. § 271.

14. Defendant sells, offers to sell, and/or uses an inventory system including, without limitation, the Mobolutions Inventory Management application, any associated hardware, and software, and any similar products (collectively, "Product"), which infringe at least Claim 1 of the '101 Patent.

15. The Product provides an application for scanning barcodes to obtain a decoded link, which contains information about an article of commerce. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.



Source: <https://www.mobolutions.com/stock-overview-app-sap-inventory-management/>

Source: <https://www.youtube.com/watch?v=KTuUbJ4AONc>

Cloud.

Enable the most fitting Cloud model for your organization. Seamlessly migrate your business processes to the Cloud without affecting your business as usual and align your cloud strategies with your unique business goals.

Source: <https://www.mobolutions.com/manufacturing/>



Barcode Scanner

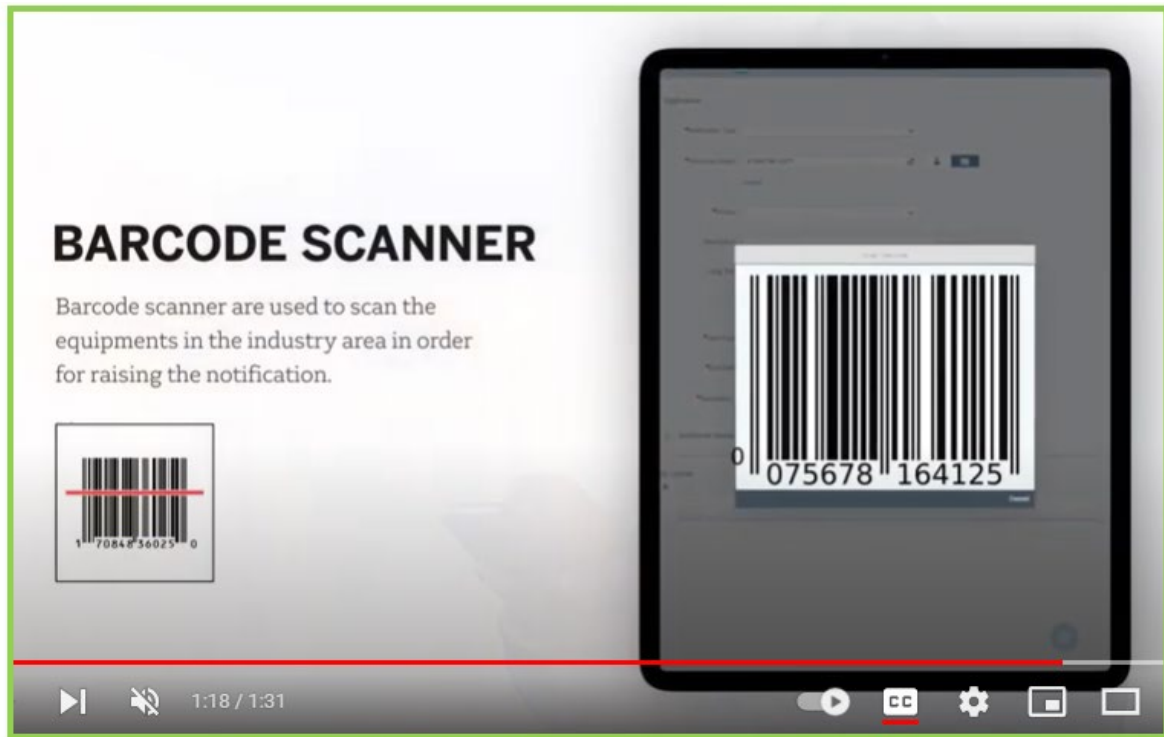
Equipment comes with encoded data that requires a detector for scanning. These details may include information such as geographical codes, web addresses, commercial codes, etc. which are crucial for maintenance. Retrieve the encoded data using the advanced barcode scanner, by first capturing the image of the equipment and then grasping the required information. It scans the equipment based on the operating system of the native device used.

Source: <https://www.mobolutions.com/pm-360/>

Key Features on SAP Inventory Management

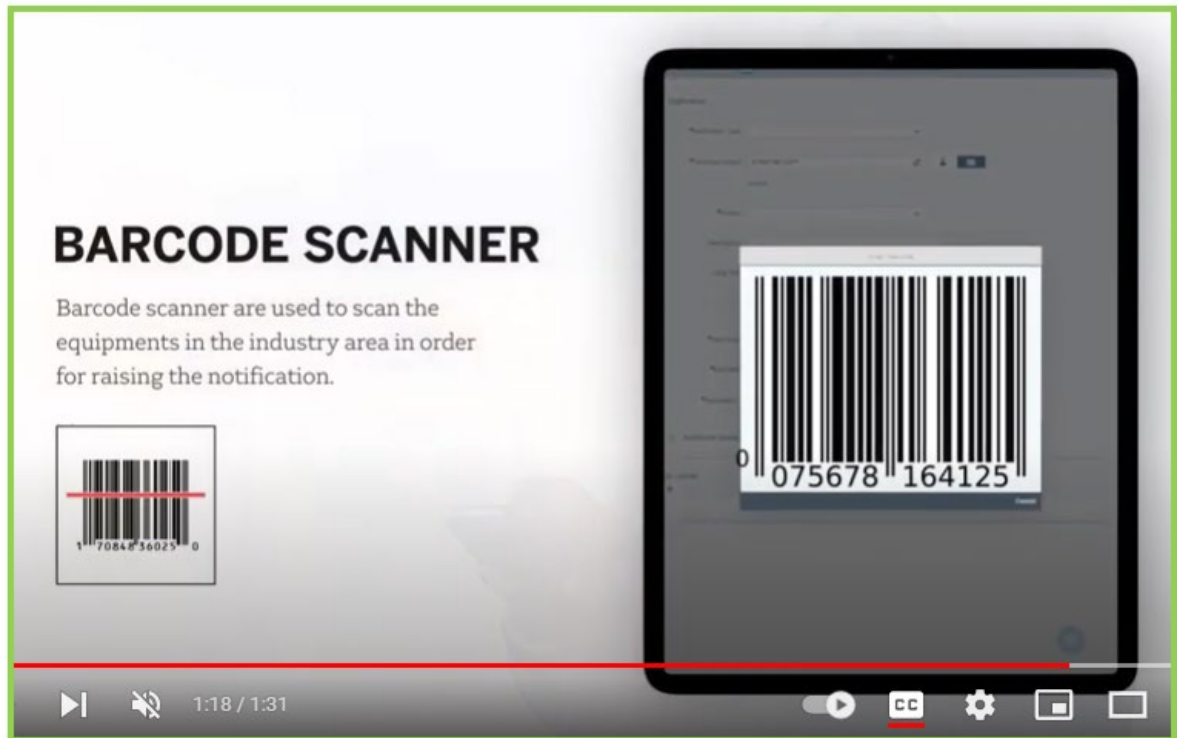
- ✓ **Intuitive user interface** – The Stock Overview App is designed to perform seamlessly and is highly responsive
- ✓ **Instant Inventory Management decisions** – Enables you to execute instant inventory decisions based on stock availability
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- ✓ **In-built Barcode Scanner** – The Stock Overview Mobile App enables the users to scan the shipped materials received with the barcode scanner feature and proceed further thereby improving the SAP Inventory Management process effectively
- ✓ **Comprehensive stock overview** – It is featured with options to provide you with a high level of detailing of stock by plant, by material, and by stock type
- ✓ **Secure, Easy-to-Deploy and Use** – Bound with a security solution that enables a secure and safe stock monitoring

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Source: <https://www.youtube.com/watch?v=KTuUbj4AONc>

16. The Product includes a mobile device comprising a portable handheld housing and a communication interface configured to enable the mobile device to communicate with a communication network. For example, the Product incorporates a handheld device (e.g., mobile device with Product software) and a communication interface (i.e., cloud-based communication interface) configured to enable the handheld device to communicate with a communication network (e.g., cloud network). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.



Source: <https://www.youtube.com/watch?v=KTuUbj4AONc>



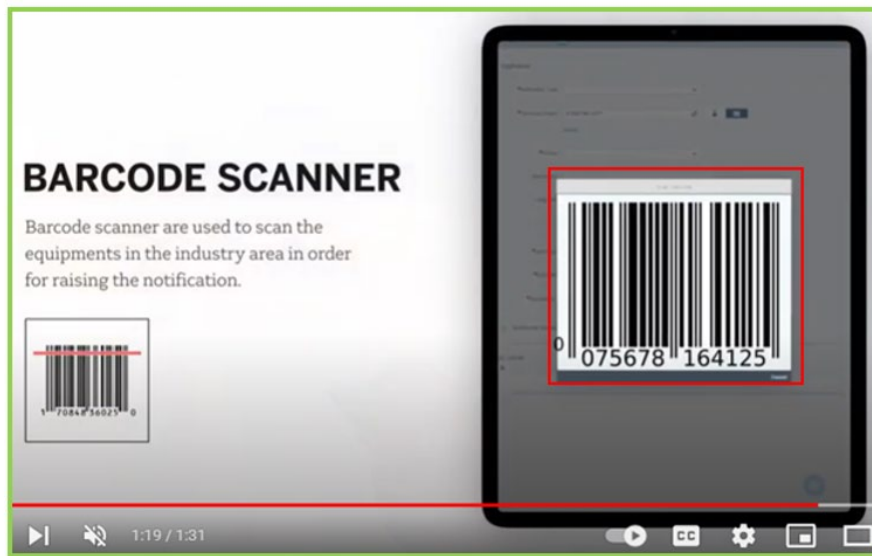
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Cloud.

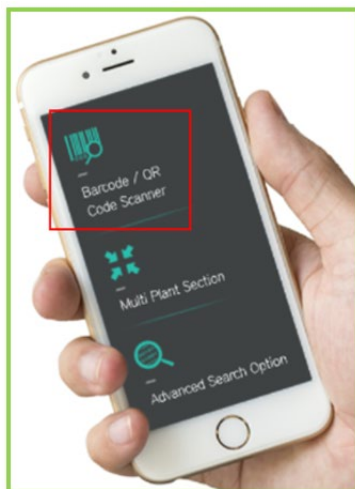
Enable the most fitting Cloud model for your organization. Seamlessly migrate your business processes to the Cloud without affecting your business as usual and align your cloud strategies with your unique business goals.

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17. The Product uses a signal processing device and a visual input device, the visual input device affixed within the portable handheld housing. For example, a visual input device (e.g., camera for scanning barcode) and signal processing device (i.e. processor of the handheld device) are affixed within the portable handheld housing (e.g., the housing of the mobile device). The mobile device camera is used to scan a barcode and, via the Product's server, obtain details related to a particular product. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

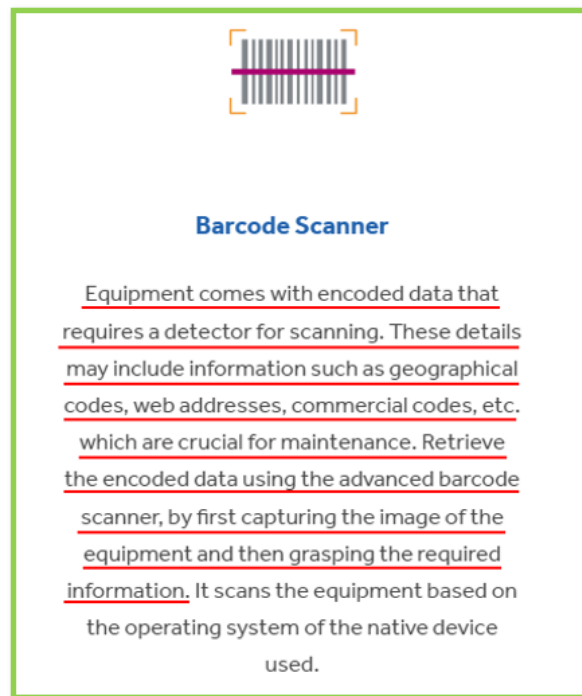


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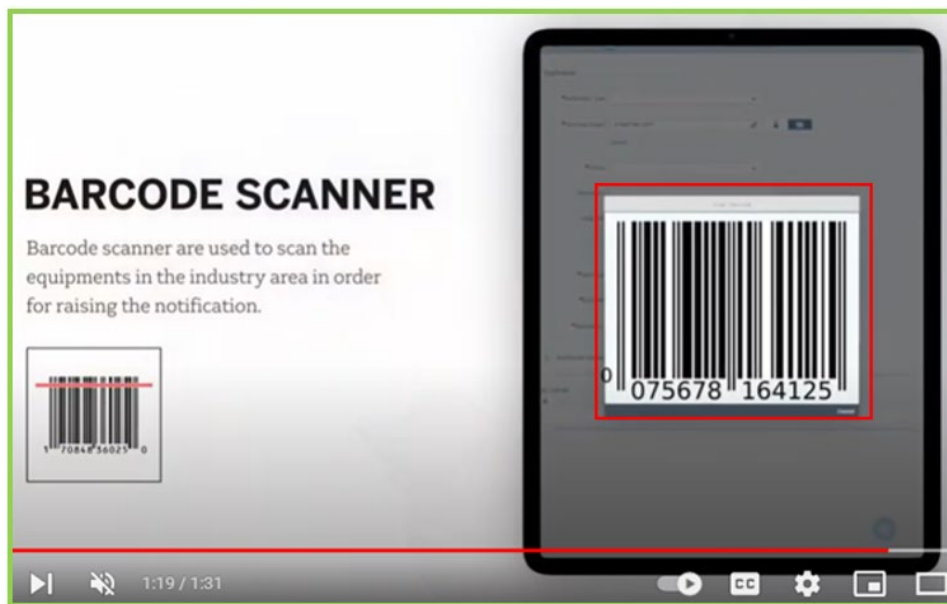


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Source: <https://www.youtube.com/watch?v=KTuUbJ4AONc>

18. The Product comprises digital files associated with the mobile device. For example, the Product application has digital files (e.g., barcode image files and digital product information) associated with the mobile device. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

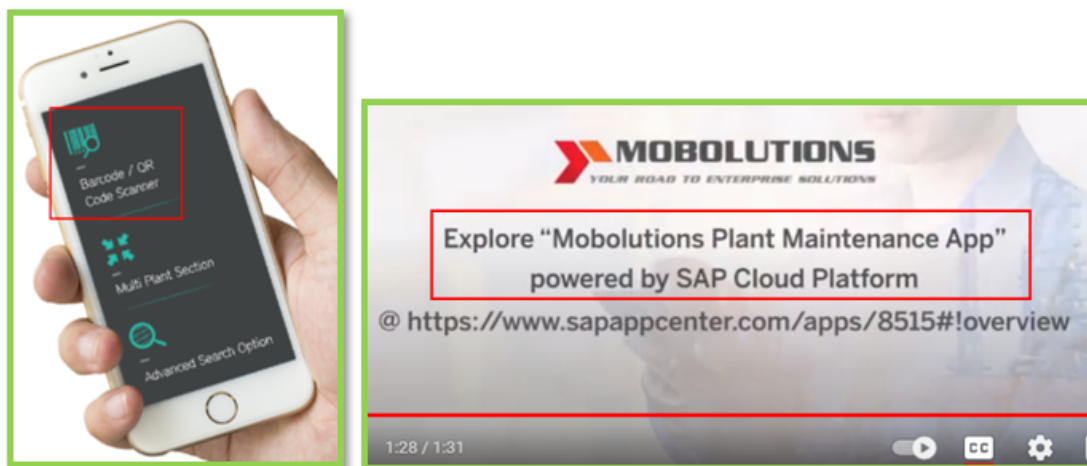


Source: <https://www.mobolutions.com/pm-360/>



Source: <https://www.youtube.com/watch?v=KTuUbJ4AONc>

19. The Product also includes a server in communication with the communication network, the server comprising a server database configured to store a look-up table that includes at least a plurality of bar codes associated with a plurality of articles of commerce. For example, the Product app communicates with a server through a cloud communication network, the server comprises a look-up table (i.e., remote database). Also, the server database contains barcodes, each having associated information about a particular article of commerce. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.



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Barcode Scanner

Equipment comes with encoded data that requires a detector for scanning. These details may include information such as geographical codes, web addresses, commercial codes, etc. which are crucial for maintenance. Retrieve the encoded data using the advanced barcode scanner, by first capturing the image of the equipment and then grasping the required information. It scans the equipment based on the operating system of the native device used.

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Display Equipment

By keeping track of all your inventory on an itemized list, the inventory list allows enterprises to know what they have and what needs to be procured to perform unhindered maintenance. The real-time inventory list helps businesses make informed choices to reduce order amounts.

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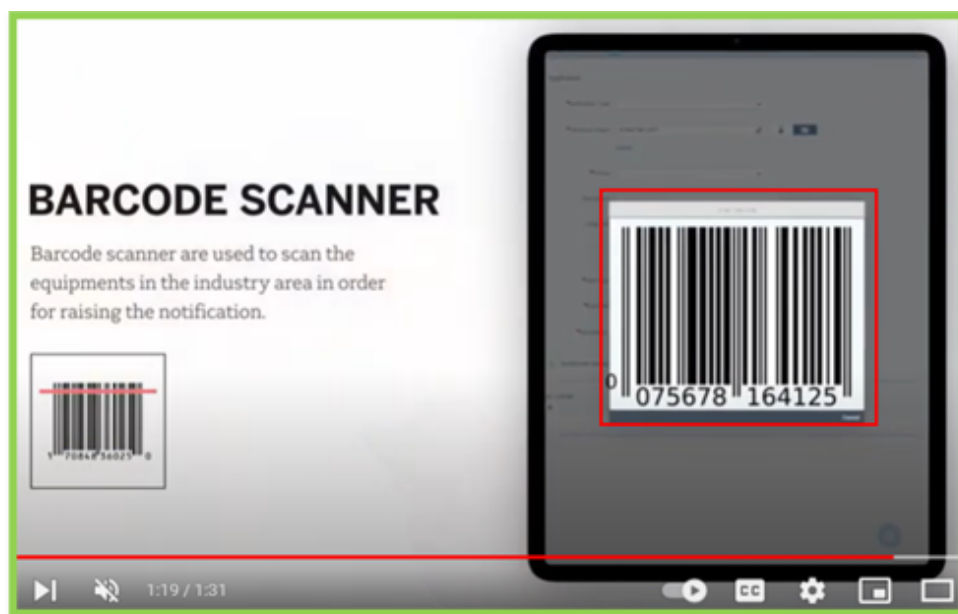
Work Order	Description	Created On	Order Type	System Status	Priority
4000505	Check air filters	01.06.2021	PM01	✓ Done	High
4000498	Bearing Maintenance	25.05.2021	PM01	✓ Done	Medium
4000497	Check the Malfunction	25.05.2021	PM01	✓ Done	High
4000496	Check the Condition of Technical Object	25.05.2021	PM04	✓ Done	High
4000495	Check filter condition	24.05.2021	PM01	✗ Not ready for completion	Low
4000494	New notification	23.05.2021	PM01	✓ Done	Very High
4000492	Preventive Maintenance Order	18.05.2021	PM01	✓ Done	Very High
4000491	Oil Leakage Repair	18.05.2021	PM01	✓ Done	Low
4000490	Check the Equipment vibration	17.05.2021	PM01	✗ Pending completion	Medium
4000488	Condition of shaft	16.05.2021	PM01	✓ Done	Medium
4000487	Check Fan Vibration	15.05.2021	PM01	✗ Not ready	Medium
4000485	Bearing Check	13.05.2021	PM01	✓ Done	Very High
4000482	Check Compressor Vibration	12.05.2021	PM01	✓ Done	High
4000476	Maintenance Request	11.05.2021	PM01	✓ Done	High
4000475	Check Malfunction	11.05.2021	PM01	✓ Done	Low
4000474	Check the Malfunction	11.05.2021	PM01	✓ Done	Very High

Work Order List

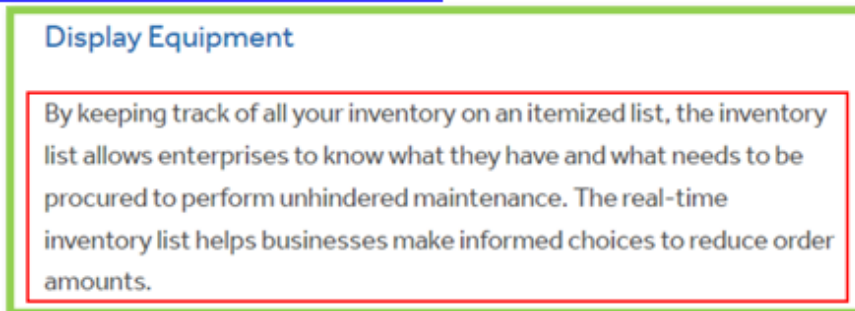
The work order list, by enabling the users to view the past work orders that have been completed, serves as an audit for the number of completed work orders. Users can also accurately track who completed the maintenance, the cost incurred, and the time it took to complete. Talk to an Expert

Source: <https://www.mobolutions.com/pm-360/>

20. The look-up table also stores a plurality of information link indicators, each information link indicator associated with a respective bar code and article of commerce. For example, the look-up table (i.e. remote cloud database accessed by the Product app/software) also stores a plurality of information link indicators (e.g., link indicating scanned product and/or validation of scanned barcode details associated with the product) indicating information associated with a respective barcode. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.



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Work Order	Description	Created On	Order Type	System Status	Priority
4000401	Check air filters	01.06.2021	PM01	✓ Complete	High
4000406	Bearing Maintenance	25.05.2021	PM01	✓ Complete	Medium
4000407	Check the Malfunction	25.05.2021	PM01	✓ Complete	High
4000406	Check the Condition of Technical Object	25.05.2021	PM04	✓ Complete	Low
4000405	Check filter condition	24.05.2021	PM03	✗ Technically completed	Low
4000404	New notification	23.05.2021	PM03	✓ Complete	Very High
4000402	Preventive Maintenance Order	18.05.2021	PM01	✓ Complete	Very High
4000401	Oil Leakage Repair	18.05.2021	PM01	✓ Complete	Low
4000400	Check the Equipment vibration	17.05.2021	PM01	✗ Not Started	Medium
4000408	Condition of shaft	16.05.2021	PM01	✓ Complete	Medium
4000407	Check Fan Vibration	15.05.2021	PM01	✗ Not Started	Medium
4000405	Bearing Check	13.05.2021	PM01	✓ Complete	Very High
4000402	Check Compressor Vibration	12.05.2021	PM01	✓ Complete	High
4000406	Maintenance Request	11.05.2021	PM01	✓ Complete	High
4000405	Check Malfunction	11.05.2021	PM01	✓ Complete	Low
4000404	Check the Malfunction	11.05.2021	PM03	✓ Complete	Very High

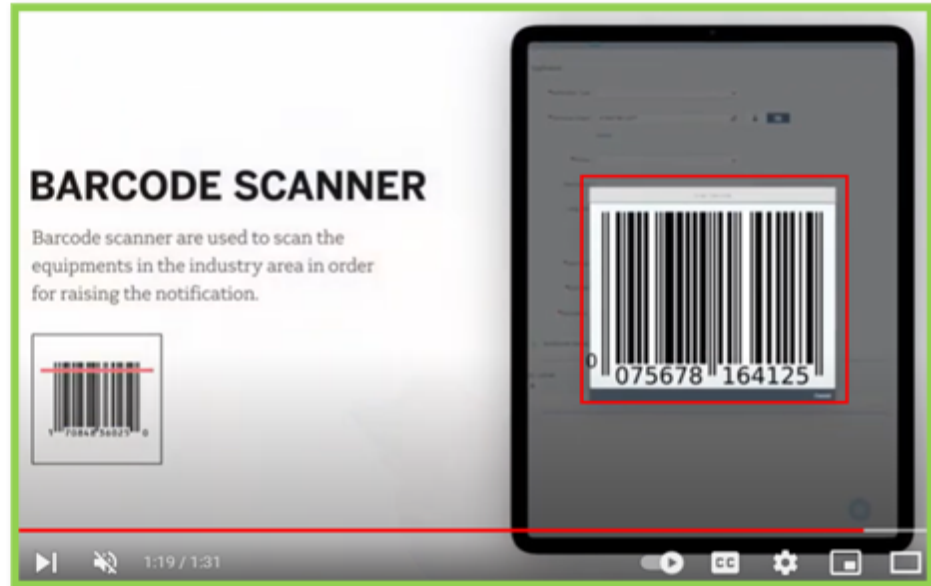
Work Order List

The work order list, by enabling the users to view the past work orders that have been completed, serves as an audit for the number of completed work orders. Users can also accurately track who completed the maintenance, the cost incurred, and the time it took to complete.

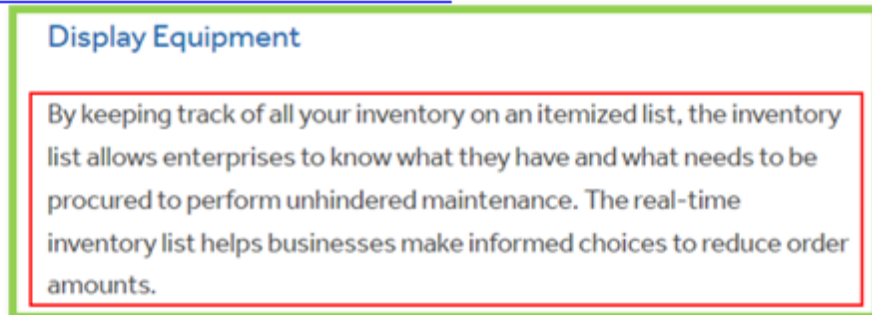
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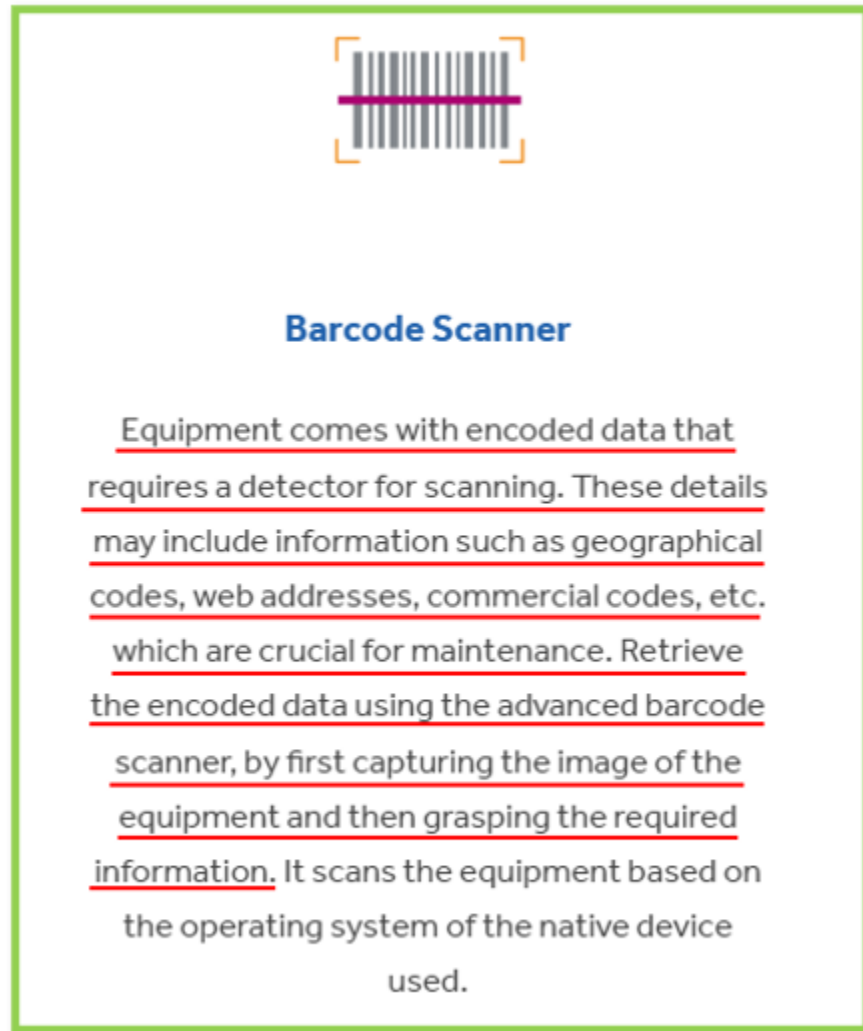
21. Each information link indicator is configured as a status signal indicating the existence or absence of a link to information pertaining to a respective article of commerce, the link is made to the information via the communication network. For example, each information link that is obtained by scanning a code indicates a status signal (e.g., link indicating validation of scanned code product and details associated with the product). The information associated with the link is retrieved through the cloud communication network. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.



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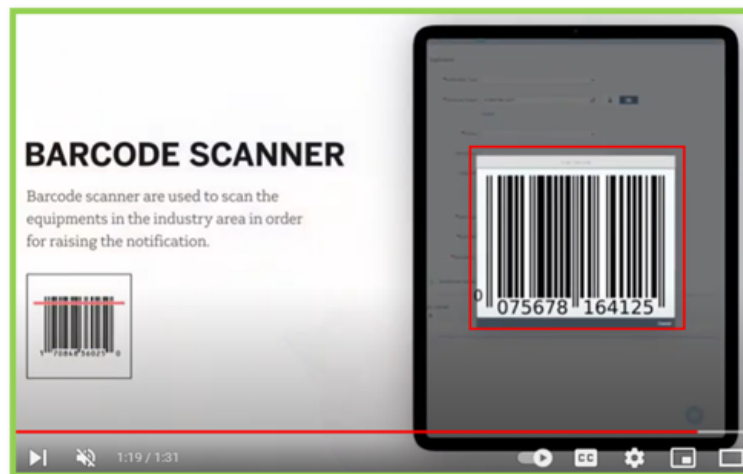
22. The visual input device is configured to scan an image of an article of commerce, decode the image to obtain a bar code, and forward data from the scanned image to the signal processing device. For example, the visual input device (i.e. handheld device camera) is configured to scan an image of a barcode associated with an article of commerce. After scanning the code, the code is decoded using Product software, which may be located on the mobile device, to retrieve information about the product. The information is forwarded to the signal processing device (i.e., processor of the mobile device). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations

herein.

Key Features on SAP Inventory Management

- ✓ **Intuitive user interface** – The Stock Overview App is designed to perform seamlessly and is highly responsive
- ✓ **Instant Inventory Management decisions** – Enables you to execute instant inventory decisions based on stock availability
- ✓ **Accurate Inventory Management**– Eliminate the manual flaws when recording the SAP Inventory data and improve the accuracy associated with it
- ✓ **In-built Barcode Scanner** – The Stock Overview Mobile App enables the users to scan the shipped materials received with the barcode scanner feature and proceed further thereby improving the SAP Inventory Management process effectively
- ✓ **Comprehensive stock overview** – It is featured with options to provide you with a high level of detailing of stock by plant, by material, and by stock type
- ✓ **Secure, Easy-to-Deploy and Use** – Bound with a security solution that enables a secure and safe stock monitoring

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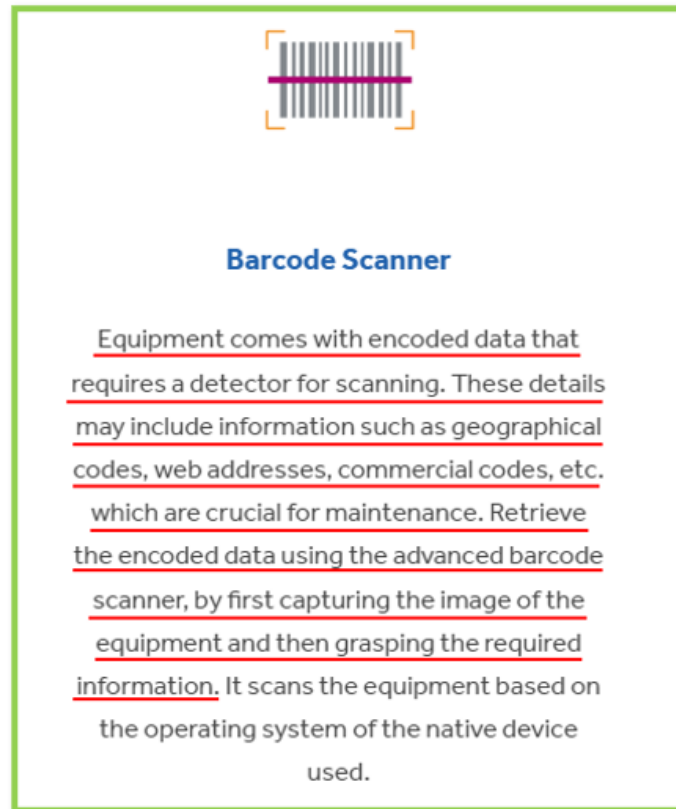


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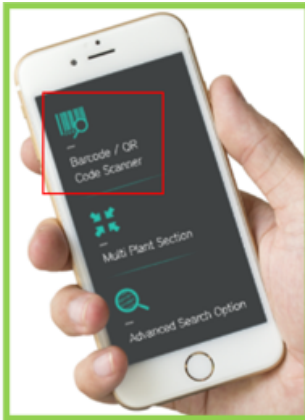
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23. In response to receiving the bar code, the signal processing device (i.e., mobile device) is configured to look up the code in the look-up table (i.e., a remote database) to determine from a respective information link (e.g., link indicating validation of scanned barcode product) whether or not information pertaining to an article of commerce associated with the code (information about the associated product) may be accessed via the communication network. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.



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Cloud.

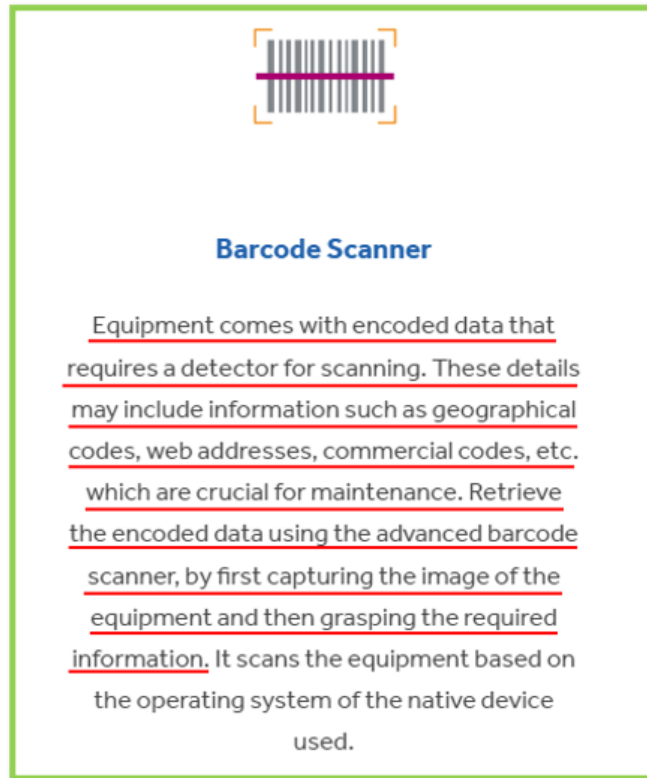
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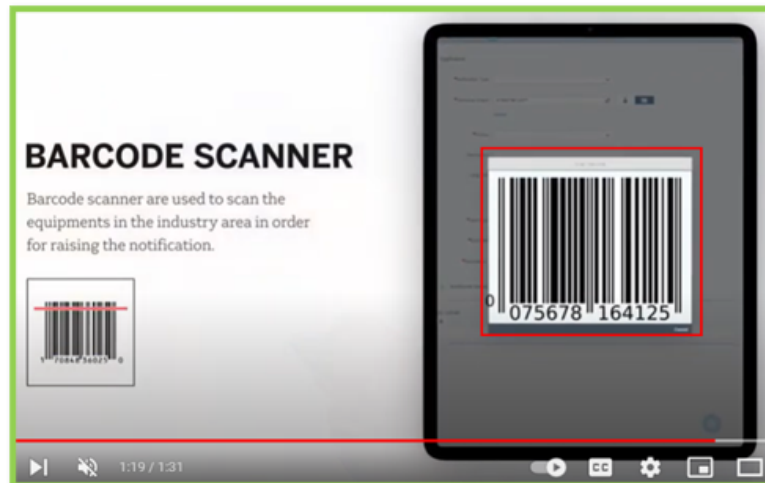
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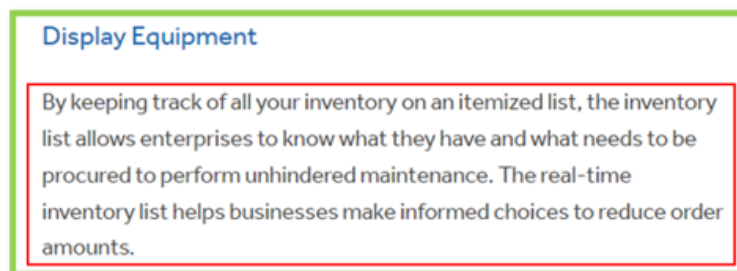
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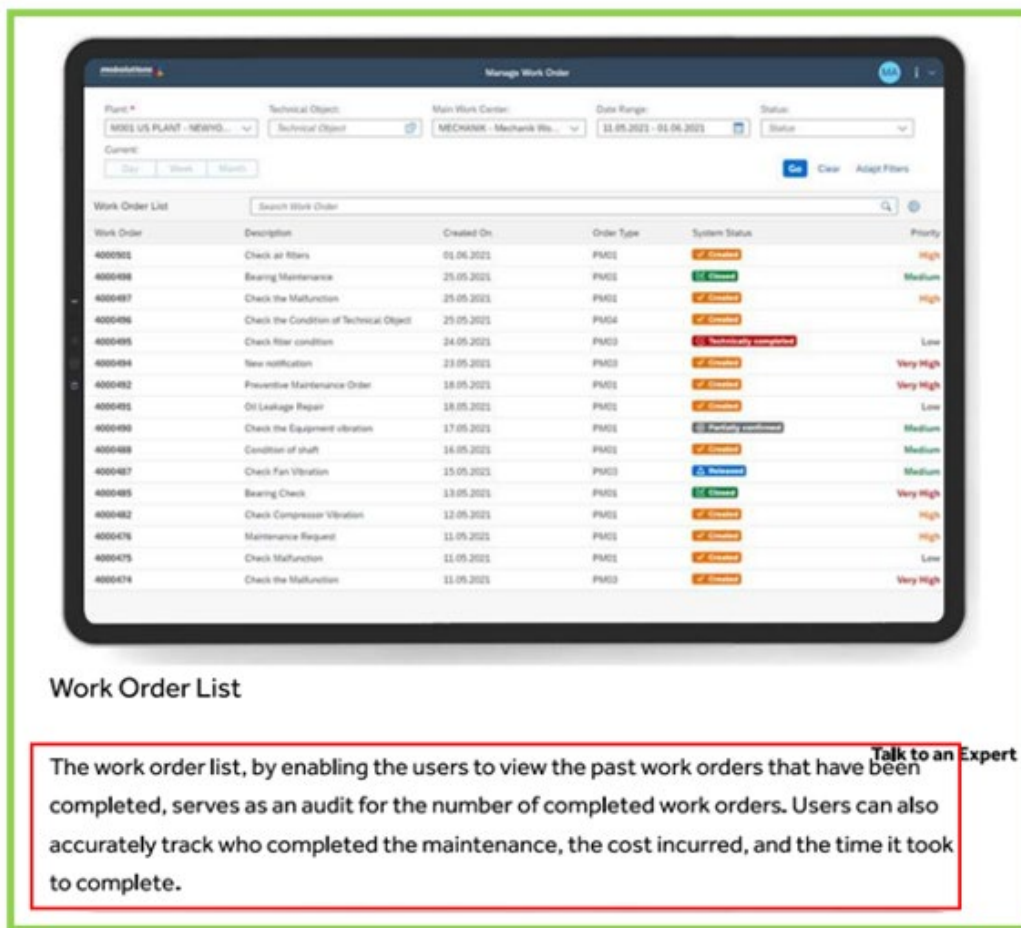
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Source: <https://www.mobolutions.com/pm-360/>

24. Defendant's actions complained of herein will continue unless Defendant is enjoined by this court.

25. Defendant's actions complained of herein are causing irreparable harm and monetary damage to Plaintiff and will continue to do so unless and until Defendant is enjoined and restrained by this Court.

26. Plaintiff is in compliance with 35 U.S.C. § 287.

DEMAND FOR JURY TRIAL

27. Rothschild Broadcast Distribution Systems, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff asks the Court to:

- (a) Enter judgment for Plaintiff on this Complaint on all causes of action asserted herein;
- (b) Enter an Order enjoining Defendant, its agents, officers, servants, employees, attorneys, and all persons in active concert or participation with Defendant who receive notice of the order from further infringement of United States Patent No. 10,600,101 (or, in the alternative, awarding Plaintiff a running royalty from the time of judgment going forward);
- (c) Award Plaintiff damages resulting from Defendant's infringement in accordance with 35 U.S.C. § 284;
- (d) Award Plaintiff pre-judgment and post-judgment interest and costs; and
- (e) Award Plaintiff such further relief to which the Court finds Plaintiff entitled under law or equity.

Dated: May 5, 2022.

Respectfully submitted,

/s/ Jay Johnson

JAY JOHNSON

State Bar No. 24067322

D. BRADLEY KIZZIA

State Bar No. 11547550

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Dallas, Texas 75201

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bkizzia@kjpllc.com

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